

**UNITED STATES DISTRICT COURT**  
**for the**  
**Southern District of Texas**  
**Houston Division**

**RONALD WORTHINGTON**  
**Plaintiff**

**V.**

**UNITED STATES OF AMERICA AND**  
**UNITED STATES POSTAL SERVICE**  
**Defendants**

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**Civil Action No.:**

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**PLAINTIFF RONALD WORTHINGTON'S ORIGINAL COMPLAINT**

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**TO THE HONORABLE JUDGE OF SAID COURT:**

Comes now Ronald Worthington, hereinafter called Plaintiff, complaining of The United States of America and The United States Postal Service, hereinafter called Defendants, and for cause of action would show unto the Court the following:

**A.**  
**PARTIES**

1. Plaintiff is Ronald Worthington, a resident of Harris County.
2. Defendants are The United States of America and The United States Postal Service. Both Defendants may be served by serving the The United States Attorney for the Southern District and the The Attorney General of the United States.

**B.**  
**JURISDICTION**

3. This Court has jurisdiction over the lawsuit under 28 U.S.C. 1346(b) because the suit involves a claim against The United States for personal injury caused by the negligent act of a government employee while acting within the scope of her employment.
4. Venue is proper in the Southern District of Texas pursuant to 28 U.S.C 1391(b)(2) as the incident which forms the basis of this claim occurred in Harris County, Texas.

**C.**  
**CONDITIONS PRECEDENT**

5. On April 19, 2018, Plaintiff submitted an administrative claim for damages to The United States Postal Service, demanding \$800,000 for damages sustained.
6. More than 6 months having elapsed, all conditions precedent to the Federal Tort Claims Act have been met.

**D.**  
**FACTS**

7. On or about October 10, 2017, Ronald Worthington was at a stop on Wright Drive in Harris County, Texas, when his vehicle was struck by a vehicle being operated by Iristis Marie Cooks.
8. Iristis Marie Cooks was in the course and scope of her employment with The United States Postal Service at the time of the collision.
9. As a consequence of this collision, Ronald Worthington suffered serious physical injuries and mental trauma.

**E.**  
**FEDERAL TORT CLAIMS ACT**

10. The collision and the resulting injuries suffered by Ronald Worthington were proximately caused by Iristis Marie Cooks' negligent, careless, and reckless disregard of the duty to control her vehicle, to operate her vehicle safely and to obey the traffic laws of the State of Texas.
11. Those duties were owed to Ronald Worthington and to others similarly situated.
12. At all times relevant, Iristis Marie Cooks was in the course and scope of her employment with The United States Postal Service, and therefore, an agent of the United States of America. The United States is therefore liable under the Federal Tort Claims Act and the doctrine of *respondeat superior*.
13. Iristis Marie Cooks' negligent conduct, whether by act or omission, included, but was not limited, the following:
  - a. Iristis Marie Cooks failed to control her vehicle;
  - b. Iristis Marie Cooks failed to keep a proper lookout;
  - c. Iristis Marie Cooks failed to control her speed.
14. Each of the aforementioned negligent acts or omissions of Iristis Marie Cooks violated the duty or duties she owed Ronald Worthington and constitute negligence and a proximate cause of the collision and the resulting damages and injuries to Ronald Worthington.

**F.**  
**DAMAGES TO RONALD WORTHINGTON**

15. As a direct and proximate result of the occurrence made the basis of this lawsuit, Ronald Worthington was caused to suffer personal injuries, including, but not limited to, the following:
  - (a) **Reasonable medical care and expenses in the past:** These expenses were

incurred by Ronald Worthington for the necessary care and treatment of the injuries resulting from the accident complained of and such charges were reasonable for such services.

- (b) **Reasonable and necessary medical care and expenses**, that within reasonable probability, will be incurred in the **future**;
  - (c) **Loss of earning capacity** in the past;
  - (d) **Loss of earning capacity** in the future;
  - (e) **Physical pain and suffering** in the past;
  - (f) **Physical pain and suffering**, that within reasonable probability, will be sustained in the future;
  - (g) **Mental anguish** in the past;
  - (h) **Mental anguish** that, within reasonable probability, will be sustained in the future;
  - (i) **Physical impairment** in the past;
  - (j) **Physical impairment** that, within reasonable probability, will be sustained in the future; and
  - (k) **Incidental Damages and expenses**.
16. As a direct and proximate result of Iristis Marie Cooks' negligent acts and omissions, Ronald Worthington has suffered losses and damages in a sum within the jurisdictional limits of the Court, and for the recovery of which this lawsuit is asserted.
17. Damages are sought for \$800,000.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff, Ronald Worthington, respectfully prays that the United States of America and The United States Postal Service be cited to appear and answer herein, and that upon final hearing of the cause, judgment be entered for Ronald Worthington against The United States of America and the United States Postal Service for damages in an amount within the jurisdictional limits of the Court, together with pre-judgment interest (from the date of injury through the date of judgment) at the maximum rate allowed by law, post-judgment interest at the legal rate, costs of court, and such other and further relief to which Ronald Worthington may be entitled at law or in equity.

Respectfully submitted,

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